

CORRES. CONTROL
INCOMING LTR NO.

00591 RF01

DUE DATE
ACTION

Department of Energy

ROCKY FLATS FIELD OFFICE
10808 HIGHWAY 93, UNIT A
GOLDEN, COLORADO 80403-8200

RECEIVED

2001 SEP -4 A 8:44

CORRESPONDENCE
CONTROL

01-DOE-016

DIST.	LTR	ENC
BOGENBERGER, V.		
BOGNAR, E.		
BRAILS FORD, M.D.		
BURNS, T.F.		
DECK, C.A.	X	X
DIETERLE, S. E.		
FERRERA, D.W.		
FERRI, M.S.		
FULTON, J.C.		
GERMAIN, A. L.		
GIACOMINI, J.		
HALL, L.		
ISOM, J. H.		
MARTINEZ, L.A.	X	X
PARKER, A.M.	X	X
POWERS, K.		
RAAZ, R. D.		
RODGERS, A. D.		
SANDLIN, N. B.		
SCOTT, G.K.	X	X
SHELTON, D.C.	X	X
SPEARS, M.S.		
TRICE, K.D.		
TUOR, N.R.		
VOORHEIS, G.M.		
WILLIAMS, J. L.		
Butler, L.	X	X
Corsi, J.	X	X
BROOKS, L.	X	X
Zellergent, C.	X	X

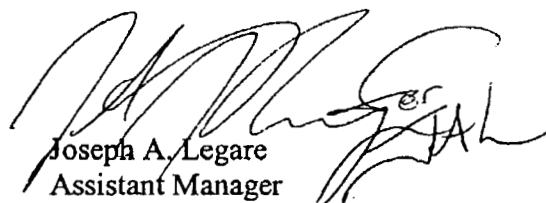
Mr. Ken Korkia
Rocky Flats Citizens Advisory Board
9035 Wadsworth Parkway, Suite 2250
Westminster, Colorado 80021

Dear Mr. Korkia:

The U.S. Department of Energy Rocky Flats Field Office received your correspondence (Number 2001-3) regarding comments on the Working Draft (May 2001) of the Environmental Restoration Rocky Flats Cleanup Agreement Standard Operating Protocol (ER RSOP) for Routine Soil Remediation. We have reviewed your comments and recommendations, and will address your comments in the revised ER RSOP before the protocol is sent out for formal public comment. Enclosed please find the Rocky Flats Environmental Technology Site's response to your comments and recommendations.

We appreciate the comments made by the Rocky Flats Citizens Advisory Board (RFCAB), and we appreciate the RFCAB's support of the ER RSOP. In addition, we look forward to providing regular updates to the RFCAB on the status of the remediation projects.

Sincerely,


Joseph A. Legare
Assistant Manager
for Environment and Stewardship

Enclosure

cc w/Enc:

N. Castaneda, ER, RFFO
J. Karparkin, ES, RFFO
A. Martinez, ES, RFFO
L. Butler, K-H
J. Corsi, K-H
T. Rehder, EPA
G. Kleeman, EPA
S. Gunderson, CDPHE
C. Spreng, CDPHE
S. Tarlton, CDPHE
Administrative Record

Reviewed for Addressee
Corres. Control RFP9/4/01
Date By

Ref. Ltr. #

DOE ORDER #

NONE



ADMIN RECORD

SW-A-004375

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Response to Comments – Working Draft RSOP for Soil Remediation

	Comments RFCAB Recommendations, August 2, 2001	Response
1	RFCAB recognizes the need to standardize the decision-making process for routine remediation of soils and associated debris at over 200 IHSS, PACs, and UBC sites. Therefore, RFCAB supports the overall premise of the ER RSOP, which is to provide a streamlined and consistent approach to making remedial decisions as defined in the scope of the ER RSOP	No response required.
2	The Rocky Flats Stewardship Working Group has recommended that a robust stewardship analysis be conducted at the planning stage of remediation projects. RFCAB feels that such analysis is crucial to making informed remediation decisions. A key question DOE and Kaiser-Hill need to address when planning remediation projects is whether the burden of leaving contamination behind is greater than the cost of cleaning it up. The ER RSOP, which explains the basis for remedial decisions, makes no mention of stewardship considerations. A section should be added to define how long-term stewardship will be incorporated into remedial decisions.	A section is being added to the ER R accelerated actions contribute to Site goals and how stewardship will be ev actions.
3	RFCAB notes that the decision-making process outlined in the ER RSOP does not include consideration of the ALARA principle. DOE has long been committed to the possibility of cleanup beyond the regulatory minimum. RFCAB recommends that the language of the ER RSOP be amended to identify the mechanism whereby the ALARA principle could be used to accomplish greater cleanup. The ER RSOP should define the process for documenting the application of the ALARA principle.	Radiation Control ARARs and an AI added to the ER RSOP.

4	<p>The ER RSOP states that soils contaminated with volatile organic compounds (VOCs) may be treated via thermal desorption and then used as backfill. RFCAB requests clarification on the backfill criteria. Specifically, RFCAB is concerned that even if relatively high levels of other hazardous constituents remain. For instance, it appears that backfill soil may be contaminated with heavy metals or PCBs up to the Tier I Action Level. RFCAB questions whether soil approaching the Tier I Action Level that has already been subject to a removal action should be returned to the environment.</p>	<p>Backfill criteria, according to RFCA,</p> <ol style="list-style-type: none"> 1. Soil below background values may anywhere onsite. 2. Soil with contaminant concentration be used a backfill in the IHSS, PA it came from. 3. Soil with contaminant concentration below Tier I ALs or agreed upon c as backfill in the IHSS, PAC, UBC from on a case-by-case basis. The will take into account both ALAR. 4. Soil treated to eliminate VOCs thr may be returned to the IHSS, PAC came from on a case-by-case basis inorganic contaminants are below cleanup levels.
5	<p>RFCAB feels that it may be premature for DOE to consider implementing this RSOP before the RSALs have been determined and the ALARA process is more clearly defined. On both counts, the ER RSOP lacks sufficient detail. Furthermore remedial decisions under the ER RSOP are predicated upon the two-tiered action level framework, which may change as a result of the RSAL review. Therefore, RFCAB requests that the ER RSOP</p>	<p>Both the RSAL revisions and ALARA remediation decisions. However, due some contaminant release sites, the va contaminants, and the relative ease of will be numerous sites where they will The ER RSOP can be applied at these needed cleanup progress:</p>

Response to Comments – Working Draft RSOP for Soil Remediation

	include a specific provision prohibiting implementation until final decisions are made on the RSALs and the ALARA process.	If RSALs have not been determined as defined by the time the final draft of the regulatory agencies, DOE and the agencies indicate that the RSALs are not in place affected by the RSALs. The sites that determined in consultation with the regulatory agencies.
6	RFCAB requests a section of the ER RSOP to clearly delineate the regulator's role in implementing this RSOP. It should describe what checks-and-balances are going to be in place to ensure that field implementation of remediation projects is consistent with the intent of the ER RSOP. At what points during a project is regulatory approval required? RFCAB feels that regulators should be given complete access to project-specific information and opportunity to interface with the ER staff during all phases of the project.	<p>The ER RSOP highlights regulatory agency flow diagrams in the RSOP and notes this interaction will occur. Additional text added to clarify regulatory agency interaction.</p> <p>As always, the regulatory agencies have access through ISEDS and upon request.</p>
7	In addition to user-friendly summaries of the documentation required by RFCA, RFCAB requests that the ER staff provide regular updates to the Board on the status of remediation projects. Their broad purpose would be to inform the public of work completed, in progress, and still to come. Particular objectives might include answers to the following questions: What analyses informed the decision on how far to excavate, or if no remediation was done, why not? On a project-specific basis, how has the site considered long-term stewardship and ALARA? By receiving such information on ER projects in real-time, rather than in a report prepared after the fact, the community would be in a better position to affect cleanup decisions.	<p>Text has been added to the ER RSOP to communicate this information.</p> <p>Monthly updates on the implementation provided at the ER/D&D Status Meeting meeting at a different time of day. It is understood that updates will include the following information:</p> <ol style="list-style-type: none"> 1. Notifications; 2. Characterization and remediation status; 3. Results of IHSS Group characterization.

Response to Comments – Working Draft RSOP for Soil Remediation

			4. Remediation areas including COC 5. Stewardship and ALARA evaluat 6. Results of post-remediation confir
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Additionally, at the Board's request, we are to provide updates on individual ER program as a whole at F1